

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

J. ENDRES,)	CASE NO. 5:17cv2408
)	
PLAINTIFF,)	JUDGE SARA LIOI
)	
Vs.)	
)	REPORT OF PARTIES' PLANNING
NORTHEAST OHIO MEDICAL)	MEETING UNDER FED. R. CIV. P.
UNIVERSITY, et al,)	26(f) AND LR 16.3(b)(3)
)	
DEFENDANTS.)	
)	

1. Pursuant to Fed. R. Civ. P. 26(f) and LR 16.3(b)(3), a meeting was held on January 24, 2018 and was attended by:

Diana R. Warshow
Todd R. Marti
Anthony J. Farris

2. Lead counsel for plaintiff: Andrew T. Miltenberg; Diana R. Warshow
Lead counsel for defendant: Todd R. Marti
3. The parties have exchanged the pre-discovery disclosures required by Fed. R. Civ. P. 26(a)(1) and the Court's prior order.
4. The parties recommend the following track: Standard
5. This case is not suitable for ADR at this time.
6. The parties do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).
7. The litigation involves claims brought by Plaintiff based on, among other things, 42 U.S.C. § 1983, the Fourteenth Amendment, and the Americans with Disabilities Act (the "ADA"), stemming from allegations and adjudication of academic misconduct charges made against Plaintiff.
8. The recommended cut-off date for amending the pleadings and/or adding additional parties is 30 days from filing of the signed Case Management Scheduling Order.

9. Recommended Discovery Plan:

- a. Parties will revisit the subjects on which discovery is to be sought, including the nature and extent of discovery, after resolution of Defendants' anticipated motion on the subject of the pleadings.
- b. Non-Expert discovery cut-off date: Six months after the resolution of the aforementioned anticipated motion.
- c. Electronic discovery – The parties have agreed to follow the default standard for discovery of electronically-stored information.
- d. Expert report due date for party with burden of proof: 30 days after the non-expert discovery cut-off date.
- e. Rebuttal expert report due date: 30 days after the expert report due date.
- f. Expert discovery cut-off date: 60 days after the rebuttal expert report due date.

10. Recommended Dispositive Motion Plan:

- a. Dispositive motion due date: 30 days after the expert discovery cut-off date.
- b. Opposition to dispositive motion due date: 30 days after the filing of the dispositive motion.
- c. Replies in support of dispositive motion due date: 15 days after the filing of the opposition to dispositive motion.

11. Recommended date for a status hearing: Within 30 days after the determination of Defendant's anticipated motion for judgment.

12. Recommended date for a final pre-trial conference: By the Court's discretion.

13. Recommended trial date: By the Court's discretion.

14. Other matters for the attention of the Court: As referenced hereinabove, Defendants anticipate filing a motion on the subject of the pleadings.

/s/ Andrew T. Miltenberg

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